

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
SIANA OIL & GAS CO., LLC	§	CASE NO. 23-32279 (JPN)
	§	
	§	
DEBTOR.	§	CHAPTER 11
	§	

CHAPTER 11 TRUSTEE'S MOTION TO
CONVERT CASE TO CHAPTER 7

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO: THE HONORABLE JEFFREY P. NORMAN,
UNITED STATES BANKRUPTCY JUDGE

Allison D. Byman, the chapter 11 trustee for the above-styled case (the “Trustee”), through her undersigned proposed counsel, hereby files her *Motion to Convert Case to Chapter 7* (the “Motion”), pursuant to section 1112(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), and in support thereof would respectfully submit as follows:

I. INTRODUCTION

1. Siana Oil & Gas Co., LLC's (the "**Debtor**") bankruptcy case should be converted to a case under chapter 7 of the Bankruptcy Code. The Debtor has reported that several operators have suspended or withheld its share of substantial production revenues attributable to producing wells in which it asserts working interests. The Debtor also has no operations, employees, or accurate and updated financial information and has not filed federal income tax returns for tax years 2020, 2021, and 2022. The Debtor has failed to maintain reporting and permitting with the Texas Railroad Commission. Additionally, the Debtor has reported accounting, business, financial, and legal problems—the resolution of which will involve considerable time and expense. Therefore, the Debtor has no business to reorganize and cannot show that there is a reasonable likelihood for rehabilitation. Neither the interests of the Debtor's creditors nor its bankruptcy estate (the "**Estate**") would be served by having the Debtor continue to unnecessarily incur the expenses associated with a chapter 11 reorganization. Accordingly, there is "cause" under section 1112(b) of the Bankruptcy Code for the Court to convert the above-styled case (the "**Case**") to a case under chapter 7 of the Bankruptcy Code.

II. JURISDICTION, VENUE, AND PREDICATE FOR RELIEF

2. The Court has jurisdiction to consider this matter under 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The predicates for the requested relief are sections 105 and 1112 of the Bankruptcy Code, rules 1017, 1019, 2002, 9013, and 9014 of the Federal Rules of Bankruptcy Procedure (individually, a "**Bankruptcy Rule**" and collectively, the "**Bankruptcy Rules**"), and rules 2002-

1, 9013-1, and 9013-2 of the Bankruptcy Local Rules for the Southern District of Texas (individually, a “**Local Rule**” and collectively, the “**Local Rules**”).

III. CORE PROCEEDING

4. This is a core proceeding under 28 USC § 157(b)(2)(A) and (O). Since this is a core proceeding, the Bankruptcy Court has constitutional authority to enter final orders regarding the relief requested in the Motion. Moreover, the Trustee consents to the Bankruptcy Court’s entry of final orders on the Motion.

5. To the extent that the Bankruptcy Court determines that it does not have authority to enter final orders on a portion of or all of the relief requested in the Motion, the Trustee requests that the Court issue a report and recommendation for a final order to the United States District Court for the Southern District of Texas, Houston Division.

IV. BACKGROUND

6. On June 27, 2023 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code and elected to proceed under subchapter V. According to the Debtor’s bankruptcy schedules, Thomas M. Ragsdale aka Tom M. Ragsdale (“**Mr. Ragsdale**”) is the president and sole member of the Debtor. *See* Docket No. 29, p. 63, ¶ 28.

7. In its *Chapter 11 Subchapter V Status Report*, the Debtor reported that several operators have suspended or withheld its share of substantial production revenues. *See* Docket No. 32, ¶¶ 11-12. The Debtor further stated that it may need to file actions against several operators. *Id.* at ¶ 5. Moreover, the Debtor has no operations, employees, or accurate and updated financial information and has not filed federal income tax returns for tax years 2020, 2021, and 2022. *Id.* at ¶¶ 1–2, 4, 10. The Debtor also indicated that it expected to retain Consolidated Asset

Management Services (Texas), LLC (“**CAMS**”) to update and improve its financial information, but the Debtor never filed an application to retain CAMS. *See* Docket No. 32, ¶ 2.

8. In the *Unsworn Declaration Under Penalty of Perjury for Section 1116 Documents*, Mr. Ragsdale declared that many of the Debtor’s financial documents were destroyed. *See* Docket No. 51, ¶¶ 2, 5, and 9. The Debtor was unable to locate a balance sheet, profit and loss statement, or statement of operations. *Id.*

9. On August 30, 2023, Mewbourne Oil Company (“**Mewbourne**”), an operator of wells in which the Debtor asserts working interests, filed a complaint in interpleader against, among others, the Debtor and its affiliate, Siana Operating LLC, commencing Adversary Proceeding 23-03180 (the “**Interpleader Action**”). The Interpleader Action involves, among other things, a dispute over title to certain oil and gas working interests and conflicting claims asserted by various parties against the net suspended proceeds from production (the “**Suspense Funds**”) attributable to eight producing wells operated by Mewbourne, referred to as the Inland Wells. According to the complaint, as of August 30, 2023, the Suspense Funds total approximately \$3,593,838.58.

10. On September 17, 2023, the Debtor filed an amended voluntary petition, removing its election for treatment under subchapter V of chapter 11 of the Bankruptcy Code. [Docket No. 68].

11. On September 17, 2023, the United States Trustee for Region 7 filed the *Expedited Motion of United States Trustee to Convert Case to Chapter 7, or in the Alternative, to Appoint a Chapter Trustee, or in the Alternative, to Dismiss Case with Prejudice*. [Docket No. 69].

12. On September 25, 2023, the Court entered the *Agreed Order Granting Motion to Appoint Chapter 11 Trustee* and directing the Office of United States Trustee to appoint a chapter 11 trustee. [Docket No. 78].

13. On September 7, 2023, the Debtor filed operating reports for June and July of 2023. [Docket Nos. 62 and 63].

14. On September 28, 2023, the Court entered its *Order Approving the Appointment of Chapter 11 Trustee*, thereby appointing Allison D. Byman to serve as the chapter 11 trustee for the Case. [Docket No. 86].

15. On October 26, 2023, Mewbourne filed its *Second Complaint in Interpleader and for Declaratory Judgment*, against, among others, the Debtor and its affiliate, Siana Operating LLC, thereby commencing Adversary Proceeding 23-03229 (the “**Second Interpleader Action**”). [Docket No. 95]. The Second Interpleader Action involves, among other things, a dispute over title to certain oil and gas real property and the conflicting claims asserted by various parties against the net suspended proceeds from production (the “**Other Suspense Funds**”) attributable to thirty (30) producing wells operated by Mewbourne. According to the complaint, as of October 17, 2023, the Other Suspense Funds total approximately \$1.7 million.

16. Subsequent to her appointment, the Trustee has retained professionals to assist her with her duties, including, legal counsel, accountants, and CAMS. [Docket Nos. 111, 126, and 130]. With the assistance of her professionals, the Trustee has undertaken efforts to gather the Debtor’s records and investigate the Debtor’s business affairs. To date, the Trustee has determined that the Debtor’s affairs are in complete disarray – *i.e.*, a complete lack of financial records, losing permitting from the Texas Railroad Commission, involved in numerous lawsuits, evidence of

potential fraudulent transfers or unrepaid loans made to the entities owned and controlled by Mr. Ragsdale, and the Debtor's bankruptcy schedules are likely inadequate.

V. REQUESTED RELIEF

17. For the reasons set forth in detail below, the Trustee seeks the entry of an order converting the Case from one under chapter 11 of the Bankruptcy Code to a case under chapter 7 of the Bankruptcy Code. The instant facts demonstrate that the requested relief is proper and in the best interests of the Debtor, its creditors, and the Estate. Accordingly, the Motion should be granted.

VI. ARGUMENTS AND AUTHORITIES

A. SECTION 1112(B) OF THE BANKRUPTCY CODE

18. Section 1112(b) of the Bankruptcy Code provides, in pertinent part:

(b)

(1) . . . [O]n request of a party in interest, and after notice and a hearing, the court shall convert a case under this chapter to a case under chapter 7 or dismiss a case under this chapter, whichever is in the best interests of creditors and the estate, for cause unless the court determines that the appointment under section 1104(a) of a trustee or an examiner is in the best interests of creditors and the estate."

11 U.S.C. § 1112(b)(1).

19. Section 1112(b)(4) contains a non-exhaustive list of examples of cause meriting conversion or dismissal. Under section 1112(b)(4), "cause" includes, in pertinent part, "substantial or continuing loss to or diminution of the estate and the absence of a reasonable likelihood of rehabilitation." 11 U.S.C. § 1112(b)(4)(A). Moreover, "cause" also includes "failure to file a disclosure statement, or to file or confirm a plan, within the time fixed by this title or by order of the court." 11 U.S.C. § 1112(b)(4)(J).

20. The Fifth Circuit Court of Appeals has instructed that “[t]he inquiry under § 1112 is case-specific, focusing on the circumstances of each debtor.” *United Savs. Ass’n of Tex. v. Timbers of Inwood Forest Assocs., Ltd. (In re Timbers of Inwood Forest Assocs., Ltd.)*, 808 F.2d 363, 371-72 (5th Cir.1987) (*en banc*). Each debtor's viability and prospects must be evaluated “in light of the best interest of creditors and the estate.” *Id.*; see also *In re TMT Procurement Corp.*, 534 B.R. 912, 917-918 (Bankr. S.D. TX. 2015). Moreover, the party seeking dismissal or conversion bears the burden of proving cause by a preponderance of the evidence. *Id.*

B. CAUSE EXISTS TO CONVERT THE CASE DUE TO CONTINUING DIMINUTION OF THE ESTATE AND THE ABSENCE OF A REASONABLE LIKELIHOOD OF REHABILITATION

21. Cause exists to convert the Case under section 1112(b)(4)(A) of the Bankruptcy Code because of substantial or continuing loss to or diminution of the Estate and the absence of a reasonable likelihood of rehabilitation. “When examining the movant’s evidence for loss or diminution, courts must look beyond a debtor’s financial statements and make a full evaluation of the present condition of the estate.” *In re Zamora-Quezada*, 622 B.R. 865, 881 (Bankr. S.D. Tex., 2017) (internal quotations and citations omitted). While the Debtor’s operating reports for June and July 2023 reflect net cash flow of \$11,269.95 and \$1,133.70, respectively, the Debtor has reported that operators have suspended its share of net production proceeds from producing wells in which it asserts working interests. Moreover, the Trustee has been unable to verify the accuracy of such operating reports, especially given the lack of accounting records. Due to the lack of accounting records, it is currently unclear if the Debtor’s share of production proceeds, after the payment of all operating expenses and severance taxes, result in a positive cash flow position for the Estate each month.

22. By remaining in chapter 11, the Debtor continues to unnecessarily incur the fees and expenses associated with a chapter 11 reorganization, including, but not limited to, those associated with the preparation and filing of monthly operating reports, incurring quarterly UST Fees, and requirements related to the preparation and solicitation of a disclosure statement and plan of reorganization, all of which only serve to diminish the Estate.

23. Additionally, the Debtor does not have a reasonable likelihood of rehabilitation. The rehabilitation analysis “focuses not on whether a debtor can propose a plan that can be successful, but rather whether the debtor can be put back in good condition and whether the debtor’s business prospects justify continuance of the reorganization effort.” *Id.* (internal quotations and citations omitted). In the instant Case, the Debtor is no longer operating, has no employees, and has lost permitting. “In the absence of an operating business to reorganize, it makes more sense for the case to proceed under Chapter 7 than under Chapter 11.” *In re Green Jane, Inc.*, 2017 WL 2312851, *6 (Bankr. C.D. Cal., 2017) (holding that conversion to chapter 7 is preferable to appointment of a chapter 11 trustee, in part, because the debtor had no operating business). Given the state of Debtor’s business operations—or lack thereof—there is no justification to continue efforts to reorganize the Debtor’s business because there is no business to reorganize. The Debtor’s affairs can be resolved in a chapter 7 case and to the extent there is equity after creditor claims have been satisfied it can be returned to the Debtor’s equity holder. Moreover, the state of the Debtor’s business and financial records, as discussed below, further supports the proposition that the Debtor lacks a reasonable likelihood of rehabilitation.

24. Finally, cause exists to convert the Case under section 1112(b)(4)(J) of the Bankruptcy Code due to the Debtor’s inability to file a disclosure statement or to file or confirm a plan. 11 U.S.C. § 1112(b)(4)(J). Prior to the Trustee’s appointment, the Court established a

deadline for the Debtor to file a disclosure state and plan in the Case, which was ninety (90) days after the Petition Date (September 19, 2023). *See* Docket No. 3. A review of the docket for the Case demonstrates that the Debtor has not complied with the deadline established by the Court, and there is no evidence that the Debtor has undertaken significant efforts to formulate, much less file, a disclosure statement and plan of reorganization to date.

25. As discussed above, the Debtor has been unable to provide any of its business or financial records and has not filed tax returns for tax years 2020, 2021, and 2022. In fact, the Debtor reported that many of its financial documents were destroyed. Specifically, the Debtor has been unable to locate a balance sheet, profit and loss statement, or statement of operation. Without such records, the Debtor will be unable to propose and confirm a chapter 11 plan of reorganization – and even assuming the most favorable turn of events with respect to obtaining business records, not in the foreseeable future. Although the Debtor expressed an intention to update and improve its financial information, no documentation has been filed to show such improvement. In fact, it was not until the Trustee’s appointed that any meaningful action was taken to improve the state of the Debtor’s financial records and that process is anticipated to be ongoing through April of 2024. Without the necessary business and financial records needed to formulate a plan of reorganization, any plan process would be further delayed and require that the Debtor linger in chapter 11 for an extended period, which would only serve to further diminish the assets of the Estate by continuing to unnecessarily incur the fees and expenses associated with a chapter 11 reorganization.

26. Both the creditors and the Estate would be best served if the case were converted and the current chapter 11 trustee were appointed as the chapter 7 trustee so that she could focus her efforts on (i) an examination of potential Estate claims in the Interpleader Action and the Second Interpleader Action regarding both the Suspense Funds and the Other Suspense Funds, (ii)

an investigation of any other Estate assets and causes of actions, and (iii) pursuing clarification of the Debtor's accounting, business, and financial problems, without the added (a) distraction related to the allocation of time and effort required to prepare, propose, and solicit a chapter 11 plan and (b) administrative expenses associated with a chapter 11 case. Thus, cause exists under section 1112(b) of the Bankruptcy Code to convert the Case because, as explained above, such conversion is in the best interests of the Debtor, its creditors, and the Estate.

VII. CONCLUSION

27. For the reasons set forth herein, the Trustee, respectfully requests that this Court enter an order converting the Case to a case under chapter 7 of the Bankruptcy Code, and for any and all further relief, both at law and in equity, to which she may justly be entitled.

SIGNED February 14, 2024

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic means via ECF transmission to all Pacer System participants in this bankruptcy case or via United States first-class mail on non-ECF participants per the attached service list, at the time of filing on February 14, 2024.

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